



Estimating the Number of Individuals with ERISA Self-Insured Coverage Who are Missing from APAC – 2018 Data

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Summary Oregon's All Payer All Claims (APAC) database contains data on 92% of Oregon residents despite lacking some self-insured data. Those not in APAC are uninsured, are covered by Federal programs such as Tricare or Veterans Affairs or are covered by self-insured plans not reporting to APAC.

Introduction Oregon's All Payer All Claims (APAC) Program houses administrative health care data for Oregon's insured population. However, health care data for some individuals are not submitted to APAC. Some examples of lines of business for which insurers do not submit data to APAC are:

- Small commercial insurers and third-party insurers, defined as those with less than 5,000 lives;
- Federal employees, military, Tricare, Indian Health Services, and Veteran Affairs;
- Worker compensation, automobile, accident, disability, and long-term care insurance; and
- Self-insured plans that are exempt from data submission requirements.

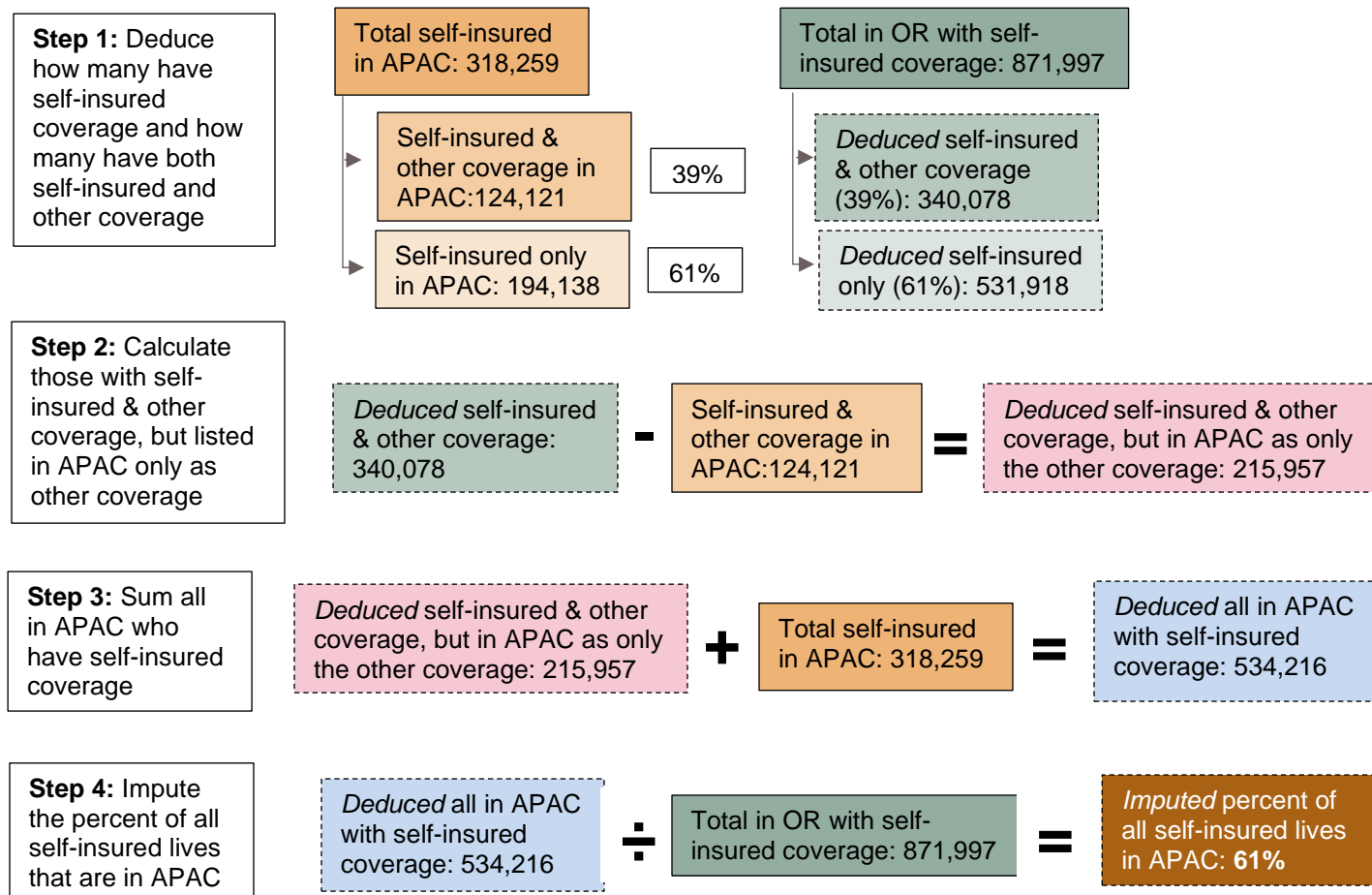
This brief focuses on self-insured plans to estimate the number and proportion of Oregon residents in this category who are missing from APAC. Out-of-state residents are excluded from this analysis.

Background In 2016 the Supreme Court of the United States issued a ruling in the [*Gobeille v. Liberty Mutual Insurance Company*](#) case clarifying that states could not require self-insured ERISA-covered health plans to submit data. Starting in 2016 the APAC data show a significant drop in the number of individuals and claims from the self-insured line of business. Using APAC and other data sources, this analysis estimates the number of Oregon residents with self-insured ERISA-covered health plans who are not represented in APAC. Some entities offering self-insured ERISA-covered plans voluntarily submit data to APAC.

Findings Using 2018 Data for Oregon Residents

	Count of Individuals in APAC	Estimated Total in Oregon from External Sources	External Data Source	Percent (Individuals in APAC ÷ Estimated Total in Oregon)
Fully-insured ⁱ	1,837,713	1,153,806	DCBS Quarterly File ⁱⁱ	~100%
Self-insured	318,259	871,997	DCBS Quarterly File ⁱⁱⁱ	36% (imputed to be 61% - see graphic below)
Medicaid	1,219,391	-	APAC receives nearly all Medicaid data ^{iv}	96%
Medicare	966,331	-	APAC receives nearly all Medicare FFS and Advantage data ^v	~100%
Total Population	3,849,840^{vi}	4,190,713	PSU Population Research Center	92%

Methodology Using data from the Department of Consumer and Business Services Department of Financial Regulation and from APAC, we estimate that 61% of all Oregon self-insured residents are represented in APAC. The figure below details the process used to arrive at this estimate.



There are challenges inherent in making this estimate. One is that an individual's health insurance coverage can change during the span of a year. Another is that people move into and out of Oregon throughout the year, making analyses based on snap shots in time difficult. Additionally, roughly 1% of individuals in APAC are not Oregon residents (mostly public employees who live out of state).

Additional interpretation The 2017 Oregon Health Insurance Survey (OHIS) estimated that 93.8% of Oregonians had health insurance at the time of the survey; this percentage is a point-in-time estimate. The APAC numbers in the table above reflect individuals who had coverage at any point in the year. A comparable reference point from OHIS is the percent of Oregonians who had coverage for at least 1 month of the previous 12 months, which is 97.1%. In other words, only 3% of Oregonians (100 – 97.1) were uninsured the entire year and would not be in the APAC counts above. Therefore the 8% who are not in APAC likely represent 3% who were uninsured the entire year (as estimated from OHIS), and another 5% who had ERISA-covered self-insured coverage the entire year or who had health insurance from another source that does not report to APAC.

Notes:

- 1) Many individuals have multiple sources of coverage. Individuals who have both self-insured and another source of coverage are in APAC, but only listed as that other source of coverage; they are not included in the APAC self-insured count because that data is not submitted to APAC.
- 2) Enrollment in the Public Employee Benefit Board (PEBB) and the Oregon Educators Benefit Board (OEBB) are included in the data table above. Most of PEBB enrollment is self-insured and reflected in the self-insured total. All of OEBB enrollment is fully-insured and reflected in the fully-insured total. All PEBB and OEBB data are in APAC.

i Excludes self-insured. The 1,837,713 individuals with fully-insured coverage could also have Medicaid or Medicare, but due to how OHA calculated this number, do not have self-insured coverage.

ii The data point used is the highest of four quarters of 2018. This number is larger than the APAC count due to how each are calculated. <https://dfr.oregon.gov/business/reg/reports-data/annual-health-insurance-report/Pages/health-ins-enrollment.aspx>

iii The data point used is the highest of four quarters in 2018. Data source is same as previous end note.

iv Individuals with limited Medicaid benefits, such as Qualified Medicare Beneficiaries, are not represented in APAC in 2018. This was approximately 4% of individuals.

v CMS reports only individuals who have reported to CMS that they reside in Oregon. CMS reported roughly 850,000 Oregon residents with Medicare in 2018. APAC data shows a higher count, which is likely due to some out-of-state member participation in Medicare Advantage or vendor-specific identifier assignment logic.

vi The total unique population in APAC was 3,882,503 in 2018. There are 3,849,756 Oregon residents in APAC. This analysis uses the latter data point.